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22 Attorneys for Creditor
23 MADCOW INTERNATIONAL GROUP LIMITED

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28 **UNITED STATES BANKRUPTCY COURT**
FOR THE EASTERN DISTRICT OF VIRGINIA

18 In re:) Case No. 08-35653-KRH
19 CIRCUIT CITY STORES, INC., et al.) Chapter 11 (jointly administered)
20 Debtors.)
21) **NOTICE OF MOTION AND HEARING FOR**
22) **MOTION FOR ENTRY OF AN ORDER**
23) **GRANTING ALLOWANCE AND**
24) **COMPELLING PAYMENT OF**
25) **ADMINISTRATIVE EXPENSE CLAIM**
26)
27) [Filed concurrently with Memorandum of
28) Points and Authorities and Declaration of
29) David Wu]
30)
31) Date: November 3, 2009
32) Time: 11:00 A.M.
33) Place: United States Bankruptcy Court,
34) Room 5000, 701 East Broad
35) Street, Richmond, Virginia 23219

1 **PLEASE TAKE NOTICE THAT MADCOW INTERNATIONAL GROUP**
2 LTD. (“Creditor”), by and through its counsel, has filed with the Court a Motion for
3 Entry of an Order Granting Allowance and Compelling Payment of Administrative
4 Expense Claim, a copy of which has been forwarded to you.

5 **Your rights may be affected. You should read these papers**
6 **carefully and discuss them with your attorney, if you have one in these**
7 **bankruptcy cases. (If you do not have an attorney, you may wish to consult**
8 **one.)** Under Local Bankruptcy Rule 400-(a), the Court may deem any opposition
9 waived, treat the Motion as conceded, and issue an order granting the requested relief
10 without further notice or hearing. If you do not want the Court to approve the Motion,
11 or if you want the Court to consider your views on the Motion, then you or your attorney
12 must:

13 [X] File with the Court, at the address shown below, a written objection.
14 If you mail your response to the Court for filing, you must mail it early enough so the
15 Court will **receive** it on or before **October 27, 2009**.

16 Clerk of Court
17 United States Bankruptcy Court
18 701 East Broad Street, Suite 4000
19 Richmond, Virginia 23219

20 [X] You must also deliver a copy to all parties on the Certificate of
21 Service below and to:

22 Douglas M. Foley, Esq.
23 **McGuire Woods, LLP**
24 One James Center
25 901 East Cary Street
26 Richmond, Virginia 23219
27
28 *Counsel for the Debtors*

22 Greg M. Galardi, Esq.
23 Ian S. Fredericks, Esq.
24 **Skadden, Arps, Slate, Meagher &**
25 **Flom, LLP**
26 One Rodney Square
27 P.O. Box 636
28 Wilmington, Delaware 19899-0636
29
30 *Counsel for the Debtors*

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	Dion W. Hayes, Esq. Joseph S. Sheerin, Esq. Sara Becket Boehm, Esq. McGuire Woods LLP One James Center 901 East Cary Street Richmond, Virginia 23219 <i>Counsel for the Debtors</i>	Chris L. Dickerson, Esq. Skadden, Arps, Slate, Meagher & Flom, LLP 333 West Wacker Drive Chicago, Illinois 60606 <i>Counsel for the Debtors</i>
	Lynn L. Tavenner, Esq. Paula S. Beran, Esq. Tavenner & Beran, P.C. 20 North Eighth Street, 2nd Floor Richmond, Virginia 23219 <i>Counsel for the Official Committee of Unsecured Creditors</i>	Jeffrey N. Poemrantz, Esq. Pachulski Stang Ziehl & Jones LLP 10100 Santa Monica Boulevard, 11th Floor Los Angeles, California 90067-4100 <i>Counsel for the Official Committee of Unsecured Creditors</i>
	Robert J. Feinstein, Esq. Pachulski Stang Ziehl & Jones LLP 780 Third Avenue, 36th Floor New York, New York 10017-2024 <i>Counsel for the Official Committee of Unsecured Creditors</i>	Robert B. Van Arsdale, Esq. Office of the U.S. Trustee 701 East Broad Street, Suite 4304 Richmond, Virginia

[X] Attend a hearing before the Honorable Kevin Huennekens, United States Bankruptcy Judge, scheduled for November 3, 2009 @ 11:00 a.m. at the United States Bankruptcy Court, Room 5000, 701 East Broad Street, Richmond, Virginia 23219.

If you or your attorney do not take these steps, the Court may deem any opposition waived, treat the Motion as conceded, and issue an order granting the relief requested without further notice or hearing.

Dated October 9, 2009

MADCOW INTERNATIONAL GROUP LIMITED

/s/ Kevin A. Lake
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9 Attorneys for Creditor
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12 **CERTIFICATE OF SERVICE**

13 I hereby certify that on the 9th day of October, 2009, I caused to be served a true and correct copy of
14 Madcow International Group Limited's NOTICE OF MOTION AND MOTION FOR entry of an
order granting allowance and compelling PAYMENT OF ADMINISTRATIVE EXPENSE claim to
15 all parties receiving notice via ECF and via ECF and/or email on the following:

16 Gregg M. Galardi, Esq.
17 Ian S. Fredericks, Esq.
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/s/ Kevin A. Lake

Kevin A. Lake

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